



fair, reasonable, and adequate. The Settlement is the product of arm's length negotiations between Plaintiffs' counsel ("Class Counsel") and Defendant, City of Edmundson ("Edmundson").

4. The Settlement provides Class Members with substantial and immediate monetary relief and Edmundson with certainty and finality, while avoiding the inherent risks, delays, and expenses associated with continued, protracted class action litigation.

5. Accordingly, and consistent with the Memorandum of Law in Support, filed herein, the Parties respectfully request that the Court grant final approval of the proposed settlement. A Proposed Order is attached hereto as Exhibit 2.

WHEREFORE, the Parties hereby move this Court for an Order (1) approving the terms of the proposed class action settlement, (2) approving Class Counsel's application for an award of attorneys' fees and costs, and (3) entering a Final Order consistent with these findings.

Dated: December 19, 2022

**Respectfully submitted,**

/s/ Maureen Hanlon

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